

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVEN E. STRAUSS,

Defendant.

NO. CR22-065 JLR

~~[PROPOSED]~~

PROTECTIVE ORDER

This matter comes before the Court on the Stipulated Motion for a Protective Order regarding discovery materials, as permitted by Fed. R. Crim. P. 16(d). Having considered the record and files herein, the Court finds there is good cause to grant the stipulated motion, and hence:

IT IS HEREBY ORDERED that the discovery materials discussed in the Motion for the Protective Order and referred to therein as "Protected Material," marked specially as "Produced Subject to a Protective Order," may be produced to counsel for the Defendant in this case.

IT IS FURTHER ORDERED that possession of Protected Material is limited to the attorneys of record in this case and their staff, and to any investigators, expert witnesses, and

1 other agents the attorneys of record retain in connection with this case, collectively referred
2 to as “the defense team.” The attorneys of record, and their investigators, expert witnesses,
3 and other agents may review Protected Material with the Defendant. The Defendant may
4 inspect and review Protected Material, but shall not be allowed to possess, photograph, or
5 record Protected Material or otherwise retain Protected Material or copies thereof. The
6 defendant is permitted to possess a copy of the protected material when he is incarcerated at
7 the federal detention center, in a manner that is managed and monitored by the facility.

8 IT IS FURTHER ORDERED that defense counsel shall not provide Protected
9 Material, or copies thereof, to any other person outside his/her law office, who is not a
10 member of the defense team, including the Defendant or their family or associates. Any
11 Protected Material sent to the Federal Detention Center (FDC) must be sent with the
12 designation as Protected so that the FDC may maintain all copies for the Defendant’s review
13 in the Education Law Library.

14 IT IS HEREBY FURTHER ORDERED that the Defendant, defense counsel, and
15 others to whom disclosure of the content of the Protected Material may be necessary to assist
16 with the preparation of the defense, shall not disclose the Protected Material or its contents,
17 other than as necessary for the preparation of defenses at trial and in subsequent appellate
18 proceedings, if necessary.

19 IT IS FURTHER ORDERED that if defense counsel finds it necessary to file any
20 documents marked as Protected Material, the material shall be filed under seal with the
21 Court.

22 Nothing in this Protective Order prohibits defense counsel from showing the
23 Protected Material, or reviewing its contents, with the Defendant or with others to whom
24 disclosure may be necessary to assist with the preparation of the defense at trial and in
25 subsequent appellate proceedings, if necessary.

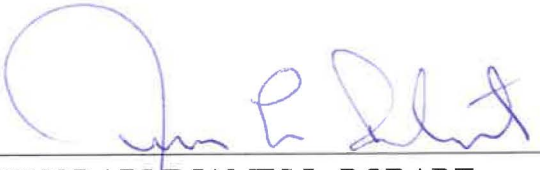
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1 Nothing in this Protective Order prohibits defense counsel from disputing the
2 designation of material as Protected Material and, if agreement cannot be reached between
3 the parties, to seeking a determination by this Court.

4 At the conclusion of the case, the Protected Material shall be returned to the United
5 States, or destroyed, or otherwise stored in a manner to ensure that it is not subsequently
6 duplicated or disseminated in violation of this Protective Order.

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8 DATED this 7th day of June, 2022.

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HONORABLE JAMES L. ROBART
United States District Judge

Presented by:

17 /s/ Cecelia Gregson
18 CECELIA GREGSON
19 Assistant United States Attorney
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